

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

42-01

10-11-01

Food Safety Systems Correlation (FSSC)

I. What is the purpose of this FSIS Notice?

This notice outlines the mission and duties of the Food Safety Systems Correlation (FSSC) teams.

II. What will the FSSC teams do?

The FSSC teams will visit official establishments to gather information about the range of practices within Districts.

III. What will FSIS do with the information collected by FSSC teams?

FSIS will evaluate the information that FSSC teams gather to determine how program personnel are following the inspection methodologies as specified in FSIS Directive 5000.1 and in other relevant directives and notices. FSIS will use the information gathered by the FSSC teams to determine the need for training, correlation activities, and instructional materials. FSIS will not use the results to rate the performance of inspection program personnel. FSIS' goal is to ensure that food safety related inspection program activities are carried out in as consistent a manner as possible throughout the country. Although not the team's focus, it will be inevitable that, at times, the team will identify trends in establishment approaches to regulatory requirements that are questionable and that need correlation. These types of findings will be considered in deciding what types of correlation and training should be provided to in-plant program personnel and, if they are interested, to establishments.

IV. How are the FSSC team information gathering activities different from In-depth Verification (IDV) reviews?

FSSC activities focus on inspection practices in the district, and secondarily on the approaches employed by the establishment; however, the entire focus of an IDV review is on the establishment. IDV reviews are conducted to assess whether an establishment is meeting all the requirements of the PR/HACCP final rule. FSSC

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NOTICE EXPIRES: 11-01-02

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reviews gather information regarding the range of practices within a District. Multi-disciplinary teams are responsible for conducting an IDV review. Unlike FSSC teams, IDV teams do not include in-plant inspection program personnel or their supervisors. Also unlike FSSC reviews, IDV reviews are currently initiated “for cause,” e.g.-- second set *Salmonella* failure, repetitive *Listeria monocytogenes* positive results on ready-to-eat products, repetitive *Escherichia coli* O157:H7 results, foreign material contamination, etc., although random IDV’s are contemplated by FSIS. When the IDV is completed in an establishment, a detailed report is written describing the findings in the establishment and is provided to the establishment. This report provides the basis for follow-up activities with the particular establishment. FSSC reports will be used for training and correlation purposes in Districts.

V. What is the general methodology for the FSSC team information gathering activities?

The FSSC team will gather information by visiting 10 percent of the establishments (randomly selected), or a minimum of 40 establishments, within a given District. Establishments will be randomly selected from each circuit within the District. FSIS will exclude establishments that are the subject of enforcement actions; those scheduled to have an IDV; and those that have had an IDV during the last year.

VI. Who are the members on the FSSC team?

Each FSSC team will consist of representatives of the Technical Service Center (TSC), the Circuit Supervisor (CS), the Inspector-in-Charge (IIC), and, possibly, a District Office (DO) representative.

VII. What will the FSSC team do before its review?

Before going to the establishment, the FSSC team will examine available information on the establishment, such as enforcement actions, PBIS data and TSC data, as well as other relevant information, including emerging policy information, to determine potential areas of interest. The FSSC team will provide sufficient notification to the management of the establishment and the IIC to inform them about the visits. The TSC representatives will meet with other members of the team at the DO prior to conducting establishment visits to ensure that the team is fully aware of the process and the goals of the visit and review.

VIII. What will the FSSC team do when it arrives at establishments?

The FSSC team will hold an entrance meeting with establishment management and explain the process. The FSSC team will emphasize to the establishment and inspection program personnel that the purpose of the establishment visit is to gather information about the range of practices within Districts. The FSSC team will also emphasize that there will be no record made of observations made about individual establishments, although the team will make notes about inspection practices that the team members observe and of trends in establishment approaches to regulatory requirements that are of concern. The FSSC team will also communicate in this meeting that if the establishment is producing and shipping adulterated product, in-plant inspection program personnel will take actions in accordance with 9 CFR part 500.

IX. How will the FSSC team conduct their information gathering activities?

A. The FSSC team will gather information about how inspection practices that address specific components of an establishment's food safety system are conducted. The food safety system components are: Sanitation SOPs, hazard analysis, CCP determination, critical limits, monitoring procedures, HACCP verification procedures, reassessment procedures, and recordkeeping procedures. Three to five of the above components will be selected for observation at each establishment. The three to five selected will vary from establishment to establishment, and all eight components will be represented in the data from all establishments visited in the District.

B. As a first step, the FSSC team looks at protocols and records associated with the components they are checking. After the FSSC team has finished with the records, the FSSC team will go into the establishment to observe inspection program personnel conducting activities related to those components. All members of the FSSC team need to interact and communicate throughout the entire establishment visit. Should it choose to participate, establishment management may accompany the FSSC team.

X. How does the FSSC team conclude its information gathering activities?

At the conclusion of the visit, the FSSC team will hold an exit conference with establishment management and discuss any immediate concerns of the FSSC team or of establishment management. Because establishment specific data do not represent the range of practices within the District, the FSSC team can not discuss this information with the establishment. Establishment-specific reports will not be written nor issued. When all the selected establishment visits have been completed in a District, the FSSC team will write a summary report that describes the range of practices observed within the District and hold an exit meeting with the DO.

XI. What are the next steps?

A. The TSC staff officers will develop correlation materials (such as Power Point presentations, case scenarios, and Q&As) to address concerns revealed through this process, and they will return to the District and then facilitate correlation activities, as appropriate, with inspection program personnel and establishments. Depending on the size of the District and the distribution of establishments therein, correlation activities may be held in multiple locations to facilitate maximum participation.

B. The content of the correlation material will require continuous updating to reflect the range of practices identified in the Districts visited. The information from previous correlation sessions may also be covered in later sessions as time permits.

XII. Who can attend the correlation meetings?

FSIS inspection program personnel and industry representatives are encouraged to attend the correlation meetings.

XIII. What is the purpose of the correlation meetings after the establishment visits have been completed for the District?

The purpose of the correlation meetings is to enhance and improve the effectiveness and consistent application of inspection activities related to food safety. Also, from the correlation meetings industry representatives will learn about FSIS' expectations and gain insight on how to meet them.

XIV. What will be discussed at the correlation meetings?

The topics addressed at the correlation meetings will depend on concerns identified within that District. For example, if concerns were identified with the completion of NRs, or confusion was found regarding the Sanitation SOP requirements and the Sanitation Performance Standards, those would be the topics addressed at the correlation meeting. If the concerns identified in another District were different, the topics at that correlation meeting would change based on findings there. Other topics not identified could be discussed if requested by the meeting attendees. If concerns develop that are more widespread than an individual District, those concerns might be addressed during correlation activities in all Districts.

*/s/
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